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June 23, 2016

VIA ECF

The Honorable Paul A. Engelmayer, U.S.D.J.
United States Courthouse
40 Foley Square, Room 2201
New York, New York 10007

**Re: John Wilson & Charles Still v. Edward “Eddie” Perrell
d/b/a Perrell Music, et als.
Civil Action No: 16-cv-104**

Dear Judge Engelmayer:

We represent Anheuser-Busch Companies, LLC, incorrectly sued and pled in the above-captioned case as Anheuser-Busch Companies, Inc. Pursuant to Rule 1(E) of the Court’s Individual Practices, I write to respectfully request that the Court grant Anheuser-Busch Companies, Inc. an extension of time to respond to plaintiffs’ Complaint for 30 days, to August 1, 2016. In the last two weeks, the parties have continued to discuss potential resolution of the case and believe that a final extension of time will maximize the chances that they may resolve the matter.

It is our understanding that the other co-defendants in the case will seek a similar extension of time, which would harmonize all of the defendants’ deadlines to answer the complaint.

The current due date is June 30, 2016, and should the Court grant this request, the due date would be August 1, 2016. Anheuser-Busch does not intend to seek any further extensions.

There have been three previous requests for an extension of time to respond to the Complaint, both of which were granted, and extended the original due date of March 25, 2016 to June 30, 2016. Because Plaintiffs and Defendants have been engaged in settlement discussions, we respectfully seek the additional extension so that they can continue to explore settlement without expending resources on litigation.

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Thank you for your consideration in this request.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "M. Stockwell", with a stylized flourish at the end.

Matthew D. Stockwell

cc: Lita Rosario, Esq. (via ECF)
Robert A. Jacobs, Esq. (via ECF)
Don Wilson, Esq. (via ECF)